REMARKS

Within the Office Action, claims 1 and 19-63 were pending. Claims 50-55 were rejected. Claims 1, 19-49, and 56-63 were allowed. Previously, claims 2-18 and 64-68 were canceled. Thus, claims 1 and 19-63 are now pending.

Rejections Under 35 U.S.C. § 103

Within the Office Action, claims 50-55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 6,249,381 to Suganuma (Suganuma) in view of U.S. Patent Number 5,313,479 to Florence (Florence) and U.S. Patent Publication Number 2001/00194554 A1 to Tadic-Galeb et al. (Tadic-Galeb). The Applicant respectfully traverses these rejections.

The independent apparatus claim 50 is directed to an apparatus for reducing laser speckle. The apparatus includes means for combining a first polarized laser output and a second polarized laser output, the first polarized laser output being incoherent with the second polarized laser output, the first polarized laser output and the second polarized laser output having orthogonal polarizations, whereby a third laser output is formed, and a depolarizing screen coupled to the third laser output.

Suganuma is directed to a system composed of a laser 32a for oscillating P-polarized light, a laser 32b for oscillating S-polarized light, lenses 33a and 33b, polarization beam splitter 35, and a lens 36 to combine the laser light of the P-polarized light and the laser light of the S-polarized light in a fiber bundle 37. [Suganuma, col. 19, lines 1-6] Suganuma does not teach that the P-polarized light from the laser 32a is incoherent with the S-polarization light from the laser 32b.

Florence is directed to a system for moving light interference patterns so that they are undetectable to the human eye. [Abstract] Florence teaches passing multiple laser beams through a diffuser to reduce or eliminate the appearance of speckle. Florence does not teach that the combined laser beams are incoherent to one another, as recited in claim 50.

Tadic-Galeb teaches a projection lens system having an illumination subsystem. [Tadic-Galeb, ¶ 0013] That portion of Tadic-Galeb cited within the Office Action teaches using a diffusive screen to intercept multiple light beams at multiple locations. [*See* Tadic-Galeb, Figure 20 and ¶¶ 0077-0078] Nowhere in that portion of Tadic-Galeb cited within the Office Action does Tadic-Galeb teach combining the light beams, let alone combining incoherent light beams, nor does Tadic-Galeb teach receiving a combined light beam on a diffusive screen as recited in claim 50. As such, the combination of Suganuma and Tadic-Galeb, as suggested in the Office

Action, is not proper as the proposed combination requires directing a combined laser light onto a diffusive screen.

Within the Office Action, it is stated that it would be obvious to one skilled in the art to provide the laser system of Suganuma with a diffusive screen as shown in Tadic-Galeb. Even if it were proper to combine the combined laser light of Suganuma with the diffusive screen of Tadic-Galeb, which the Applicant contends is not proper, it is stated in the Office Action that the motivation for such a combination is found in a third reference, Florence. The motivation stated for combining Suganuma and Tadic-Galeb is to provide a speckle free image displayed on a screen of Florence. The Applicant contends that it is only through hindsight, that is, having knowledge of the Applicants' invention, that led to the combination as suggested within the Office Action. But for this knowledge, the combination as such would not have occurred to the Examiner, as it did not occur to those skilled in the art to make the asserted combination. In other words, the combination proposed within the Office Action is being made only in light of knowledge of the Applicants' disclosure. This is further substantiated since the motivation to combine two references, Suganuma and Tadic-Galeb, lies in a third reference, Florence.

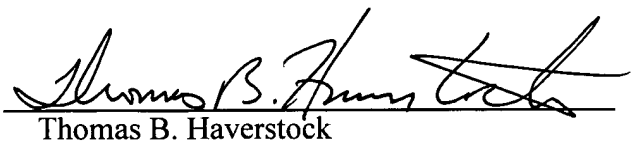
Further, the Applicant contends that the limitations claimed in the independent apparatus claim 50 is non-obviousness, and that this non-obviousness of the is implied within the current Office Action. Specifically, it is stated within the Office Action that the independent method claim 56 is allowable. Claim 56 is directed to a method for reducing laser speckle comprising the steps of combining a first polarized laser output and a second polarized laser output to form a third laser output, the first polarized laser output being incoherent with the second polarized laser output, the first polarized laser output and the second polarized laser output having orthogonal polarizations, and illuminating a depolarizing screen with the third laser output. Independent apparatus claim 50 recites each of the method steps of allowable method claim 56 in means plus function format. As method claim 56 is allowable, as stated in the Office Action, then apparatus claim 50 is also allowable.

For at least these reasons, claim 50 is allowable over the cited prior art. Furthermore, because claims 51-55 depend from claim 50, they too are allowable as depending from an allowable base claim.

For the reasons given above, the Applicant respectfully submits that the claims are now in condition for allowance, and allowance at an early date would be appreciated. If the Examiner has any questions or comments, he is encouraged to call the undersigned at (408) 530-9700 to discuss them so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: 2-24-04

By: 
Thomas B. Haverstock
Reg. No. 32,571
Attorneys for Applicant(s)